

Response to Comments on Preliminary Minor Permit No. AQ0068MSS01
Union Oil Company of California
King Salmon Platform
Portable Oil and Gas Operations Relocation to King Salmon Project

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This document provides the Alaska Department of Environmental Conservation's (Department's) reply to all public comments on the preliminary decision to issue Minor Permit No. AQ0068MSS01 to Union Oil Company of California (UOCC), for the King Salmon Platform. The Department provided opportunity for public comment on the permit starting June 5, 2008 and ending July 7, 2008.

The Department's responses are shown in *Times New Roman italic font*.

Commenter: UOCC (comments verbatim from commenter)

Comments on the permit:

1. Typographical Error. **Correct Typographical Error.** Signature Page; Project – Please amend this description as follows to correct a typographical error.

Portable Oil and Gas Operation (POGO) Relocation ~~Reelocation~~ to King Salmon Platform.

Response: *Permit revised as requested.*

2. Typographical Error. **Correct Typographical Error.** Condition 3.1 – Union Oil Company of California (UOCC) believes that the reference to a condition should be to Condition 3.2. Please amend this condition as follows to correct the reference.

The permittee shall add assessable emissions for this permit listed in condition 3.2 ~~3.1~~ to any other assessable emissions for the stationary source.

Response: *Permit revised as requested.*

3. Typographical Error. **Correct Typographical Error.** Condition 3.2a. – Please note that the potential assessable emissions of 603 tons per year (tpy) stated in this condition is inconsistent with the 602 tpy stated in Table 2 of the Technical Analysis Report (TAR).

Response: *Permit revised as requested, permit corrected to be consistent with TAR.*

4. Revise Permit Condition. **Add Sub Condition to Preliminary Permit Condition 5.** Condition 5 – Please add the following sub-condition for determining visible emissions compliance for the fuel gas-fired heater (Emission Unit ID 23)

For EU ID 23, burn only gas as fuel. Verify the initial compliance of this emission unit with a certification in the first operating report required under Condition 15 that the emission unit fires only gas.

Response: Permit revised as requested, the Department agrees that certifying the unit burns gas is sufficient to show compliance with the visible emission standard.

5. **Revise Permit Conditions. Revise Preliminary Permit Condition 5.1.** Condition 5.1 – Please amend this condition as follows to remove the reference to Emission Unit ID 23, a gas-fired heater.

Verify the initial compliance of Emission Units 24 and 23 through 25 by either

Response: Permit revised as requested, see Comment 4.

6. **Revise Permit Condition. Revise Preliminary Permit Condition 5.1b.** Condition 5.1b. – Please amend this condition as follows to require a Method 9 visible emission source test within 30 days after beginning unit operation. A unit could be installed but not operated for more than 30 days following installation. UOCC does not believe that the Alaska Department of Environmental Conservation (ADEC) intends to require the operation of an emission unit solely for the purpose of visible emissions testing.

Conducting a Method 9 visible emissions source test within 30 days after beginning of unit operation ~~installation~~

Response: Permit revised as requested, the Department agrees that conducting the test within 30 days after beginning operation is sufficient.

7. **Revise Permit Condition. Revise Preliminary Permit Condition 15.** Condition 15 – Please amend this condition as follows to reduce the number of operating report copies and to authorize the submission of an electronic copy of the report. UOCC does not believe that ADEC has a need for an original and two copies of each operating report, but does believe that an electronic copy of each operating report would be more useful than a hard copy.

During the life of this permit, the Permittee shall submit to the Department an original and one copy ~~two copies~~ of an operating report by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year. The Permittee may provide the copy in portable document format (.pdf); MS Word format (.doc), or other computer-readable format approved by the Department

Response: Permit revised as requested, the Department agrees that one copy is sufficient and it may be in electronic format.

Comments on the TAR:

8. **Revise TAR. Update Acronym.** General – Please replace all references to “UNOCAL” in the TAR with “UOCC.”

Response: TAR revised as requested.

9. **Revise TAR. Make TAR Consistent with Permit.** Section 5.2.2.1; Visible Emissions; Second Paragraph – Consistent with the requested change to Permit Condition 5.1b, please amend the second sentence of this paragraph as follows.

Therefore, the permit requires UOCC ~~UNOCAL~~ to conduct an initial visible emissions compliance demonstration with 30 days after beginning operation ~~of installation~~ of Emission Units 23 through 25 under this permit

Response: TAR revised as requested, see Comment 4. The Department revised the TAR after clarification with UOCC to state Emission Unit 24 and 25 rather than Emission Units 23 through 25.

10. **Typographical Error. Correct Typographical Error.** Section 5.2.2.3; Sulfur Dioxide – Please amend the first sentence of this section as follows to be consistent with the TAR.

Emissions Units 23 through 25, as contained in Table 1 Minor Permit Emission Unit Inventory, contained in Permit No. AQ0068MSS01 are new units authorized by this minor permit.

Response: TAR revised as requested.

11. **Typographical Error. Correct Typographical Error.** Attachment A; Modeling Review Memorandum; First Paragraph – Please correct the application submission date to be February 26, 2008.

Response: TAR revised as requested.

12. **Revise TAR. Add Clarification.** Attachment A; Modeling Review Memorandum; Background – Please amend the first sentence of this section as follows to clarify the statement.

UOCC submitted an application for Air Quality Control Minor Permit No. AQ0068MSS01 on February 26 ~~22~~, 2008 for ~~a portable~~ the Cudd 340 portable drill rig operation on the KSP.

Response: TAR revised as requested.

